

# **EXHIBIT J**

**Kappler, David**

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**From:** Haefele, Robert  
**Sent:** Tuesday, February 20, 2018 4:22 PM  
**To:** Alan Kabat; 'Martin McMahon'; 'Peter Salerno'; Amy Rothstein  
**Cc:** jflowers@motleyrice.com; Sean Carter; Tarbutton, Scott; Jim Kreindler  
(JKreindler@kreindler.com); Andrew Maloney [AMaloney@kreindler.com]; Goldman,  
Jerry; Strong, Bruce  
**Subject:** 20180220 Ltr to Kabat Salerno Rothstein McMahon re Individual Defendants.pdf  
**Attachments:** 20180220 Ltr to Kabat Salerno Rothstein McMahon re Individual Defendants

Dear Alan, Martin, Peter, and Amy,

Please see attached correspondence from the PECs in 03 MDL 1570.

Regards,

**Robert Haefele** | Attorney at Law | Motley Rice LLC  
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464 | rhaefele@motleyrice.com  
o. 843.216.9184 | c. 843.834.1951 | f. 843.216.9450

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haechele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA Electronic Mail Only**

February 20, 2018

Alan Kabat ([kabat@bernabeipllc.com](mailto:kabat@bernabeipllc.com))  
 Bernabei & Kabat, PLLC  
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 Washington, DC 20036

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 Amy Rothstein ([amyrothsteinlaw@gmail.com](mailto:amyrothsteinlaw@gmail.com))  
 Salerno & Rothstein  
 221 Schultz Hill Road  
 Pine Plains, NY 12567

Martin McMahon ([mm@martinmcmahonlaw.com](mailto:mm@martinmcmahonlaw.com))  
 Martin F. McMahon & Associates  
 1150 Connecticut Avenue, N.W., #900  
 Washington, D.C. 20036

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Alan, Martin, Peter and Amy:

The Plaintiffs' Executive Committees ("PECs") have now received responses from Dallah Avco, WAMY, and MWL/IIRO regarding their intentions to facilitate or not facilitate production of the witnesses identified in the PECs' February 6, 2018 letter as associated with those three defendants; but we have not received a response that expresses the intentions of the individual defendants, which each of you represent.

By Thursday, February 22, 2018, please advise us what position each of the individual defendants takes regarding: (1) whether the individual defendants intend to comply with their discovery obligations and appear for a deposition and (2) whether, assuming there is no impediment to obtaining a visa, the identified witnesses will be presented for deposition in either New York or one of the other Presumptively Acceptable Locations set forth in Judge Netburn's Order (specifying which location has been selected), and if not, why these locations would not be acceptable for the particular witness.

Regards,

Messrs. Kabat, McMahon, Salerno, and Ms. Rothstein

February 20, 2018

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MOTLEY RICE LLC

By: /s/ Robert T. Haefele  
ROBERT T. HAEFELE  
For the Plaintiffs Exec. Committees

KREINDLER & KREINDLER

By: /s/ James P. Kreindler  
JAMES P. KREINDLER  
For the Plaintiffs' Exec. Committees

COZEN O'CONNOR

By: /s/ Sean P. Carter  
SEAN P. CARTER  
For the Plaintiffs Exec. Committees

ANDERSON KILL

By: /s/ Jerry S. Goldman  
JERRY S. GOLDMAN  
For the Plaintiffs' Exec. Committees